

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

TONY SALVATORE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:19-cv-00660-CDP
)	
THE CITY OF WILDWOOD, a municipal)	
corporation, JAMES BOWLIN, in his)	District Judge Catherine D. Perry
individual capacity, RYAN THOMAS, in)	
his individual capacity, and RAYMOND)	
MANTON, in his individual capacity,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING PLAN

COME NOW Tony Salvatore (“Plaintiff”) and The City of Wildwood, James Bowlin, Ryan Thomas and Raymond Manton (collectively “Defendants”), submit the following Joint Proposed Scheduling Plan in accordance with the Court’s Order dated April 12, 2019.

(a) The parties agree that Track 2 is appropriate in this matter.

(b) Deadline for joining additional parties or amendment of pleadings in this matter:
September 16, 2019.

(c) Proposed Discovery Plan:

(i) Unless specifically requested in another format, any electronically stored information subject to disclosure under Fed. R. Civ. P. 30, 31, 33, 34 and 36 shall be reproduced in a printed form or in PDF format.

(ii) The parties have agreed on the following procedures with respect to any inadvertently disclosed work product or privileged information: Privileged documents will maintain their privilege even if inadvertently disclosed and the receiving party must notify the disclosing party and either return or destroy the privileged documents including all copies.

(iii) The parties will disclose information and exchange documents pursuant to Fed. R. Civ. P. 26(a)(1) on or before **June 30, 2019**.

(iv) The parties agree that discovery should not be conducted in phases or limited to any certain issues.

(v) The parties do not anticipate the need for expert witnesses in this case.

(vi) The parties agree that the presumptive limits of ten depositions per side and twenty-five interrogatories per party as set forth in Fed. R. Civ. P. 30 and 33, respectively, should apply in this case.

(vii) The parties do not anticipate the need for physical or mental examinations in this case, but reserve the right to request them, pursuant to Rule 35, on or before **September 16, 2019**.

(viii) All discovery will be completed by **January 15, 2020**.

(ix) The parties reserve the right to request protective orders in all appropriate situations which may arise, including, but not limited to, confidential, proprietary and trade secret business information and confidential protected health information.

(d) The parties are agreeable to participating in alternative dispute resolution. The parties agree to mediate this case by **September 2, 2019**.

(e) All motions to dismiss and motions for summary judgment must be filed on or before **April 3, 2020**.

(g) The parties agree that this case should be ready for jury trial by **August 15, 2020**.

(h) The parties estimate it will take 4-5 days to try this case to a verdict.

(i) There are no other matters the parties wish to bring to the Court's attention at this time.

Respectfully submitted by,

**DONNER APPLEWHITE,
ATTORNEYS AT LAW**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all parties of record on May 2, 2019 via the Court's electronic filing system to:

/s/ Christian T. Misner